



COMMONWEALTH of VIRGINIA

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TO: State Air Pollution Control Board Members
FROM: James E. Sydnor, Air Division Director
SUBJECT: Proposed State Operating Permits for Mirant Potomac River Generating Station
DATE: October 5, 2007

Please find attached two proposed comprehensive State Operating Permits (SOP) for the Mirant Potomac River Generating Station (PRGS). The following is a general overview of the permit contents. A more in-depth explanation will be presented at the October 10, 2007 Air Board Meeting.

The first proposed SOP assumes the current 5 stack configuration and expands upon the June 1, 2007, SOP by including all pollutants. The permit sets annual and hourly limits for SO₂, NO_x, PM, PM-10, PM-2.5, VOC, HCl, and HF. The annual limits were established using the June 1 SOP. Although only one pollutant, SO₂, had an annual limit as a condition in the June 1 SOP, the other pollutants were limited based on the operational constraints imposed by the permit. The hourly limits are based on modeled values that demonstrate NAAQS compliance. Unlike the June 1 SOP, this permit sets limits on each boiler. Additionally, more testing, monitoring and recordkeeping are required than in the June 1 permit.

The second proposed SOP is essentially the same as the 5 stack SOP but assumes the 5 stacks have been reconfigured into 2 stacks (stack merge). This permit sets the same annual limits as in the June 1 SOP and the proposed 5 stack configuration permit. The hourly limits are based on modeled numbers that demonstrate compliance with the NAAQS and assumes dispersion credit for SO₂, PM, PM-10, PM-2.5, HCl and HF. To date, these pollutants have been shown as being controlled as a result of the addition of Trona. The hourly limits are higher in the 2 stack configuration than in the 5 stack configuration due to the greater dispersion created by going from 5 stacks to 2 stacks. Note this is not an NSR permit that would authorize construction.

A technical support document will be prepared and released at the time of public hearing notice.